

# EXHIBIT B

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

WAYNE B. LYNCH, Administrator  
of the Estate of DONOVAN W. LYNCH,  
Deceased,

Plaintiff,

V.

SOLOMON D. SIMMONS, III, et al.,

Defendants.

Case No. 2:21-cv-341

**AFFIDAVIT OF JEFFREY WALTER REICHERT**

I, Jeffrey Walter Reichert being sworn state as follows under penalty of perjury:

1. My name is Jeffrey Walter Reichert, I am 49 years old, and my current residence is 3812 Bruce Road, Chesapeake, VA 23321. I am competent, healthy, and of sound mind.

2. The purpose of this Affidavit is to establish that I have served and continue to serve as the attorney of fact and legal representative for the Estate of Donovan Lynch (“Estate”), since its establishment in April 2021, and the attorney of fact for Wayne Lynch and the Lynch family since March 27, 2021, the morning after Mr. Donovan Lynch was killed.

3. I have been practicing law in good standing in Maryland since July 2000. In my practice, I have clerked at the U.S. Attorneys Office, spent 11 years in the US Army Reserves JAG Corps and was the General Counsel for a multi-billion-dollar global staffing corporation (20+years), retiring from both in 2015 to be a full-time single father.

4. I founded Reliance Legal, LLC, in Maryland in 2016 and practice as a solo practitioner. I represent individuals and clients all around the country - mainly in the staffing industry, but my practice areas vary. I regularly engage and retain local counsel on behalf of my clients for litigation or other various legal needs.

5. I grew up in Virginia Beach and graduated from Cox High School in 1991. I graduated from Randolph-Macon College in 1995. After being consented full custody of my son in Maryland, we decided to relocate back to my hometown in December 2020 and raise my son closer to my friends and family in the environment I grew up in. I am fully intending to apply to the Virginia bar and practice law here in Virginia.

Affidavit of Jeffrey W. Reichert, Esq.  
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6. I have known Wayne Lynch for 30 years. He was a mentor and coach to me when I was growing up. We developed a close relationship on the basketball courts of Virginia Beach and maintain that relationship currently.

7. Wayne and Donovan retained my services in February 2021, to try to bring a charity All-Military Basketball tournament to Virginia Beach in the fall of 2021. I had just moved back to the area with my son. In March 2021, Wayne and I began coaching two teams together - one being my son's team. We were in constant daily communication.

8. On the early morning of March 27, 2021, I called Wayne to check in after hearing about all the shootings at the Oceanfront the night before. I was shocked to hear that it was Donovan. Wayne asked me if I could help him. I immediately offered my legal services and have represented him in this tragedy ever since.

9. I have spoken on behalf of the Lynch family to the Virginia Beach Police, the Mayor, the press and handled all legal matters on behalf of the family and the Estate. I also spoke to witnesses, friends and family members about the events of March 26, 2021. Based on those conversations, I advised the Lynch family to pursue this civil lawsuit.

10. We executed a formal retainer agreement on April 6, 2021, attached as Exhibit A. I am licensed in Maryland and was directed to investigate the case and then hire local counsel/trial counsel to file and litigate this case at my direction and supervision.

11. I legally advised and assisted in establishing the Estate of Donovan Wayne Lynch in April 2021. I have served as the legal representative for the Estate since its inception.

12. I investigated this case and spoke to witnesses. I have also retained investigators and the assistance of other attorneys on behalf of the Estate to assist in the process. At all times I acted according to my duties as attorney-in-fact to Wayne and the Estate.

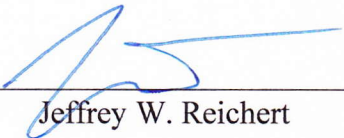
13. I advised Wayne in his role as the Administrator of the Estate in retaining Anchor Legal Group and Quinn Emmanuel. I advised the Estate to terminate those same firms. One of the main reasons for termination arose from their errors in causing confusion regarding my role as attorney of fact and creating the need for these Motions.

14. I advised the Estate to hire Justin Fairfax and Tom Martin, who are currently trial counsel representing the Estate in this case. I regularly interact with them and update and advise the Estate about the current litigation all under the Estate's Attorney-Client Privilege.

15. My Attorney-Client Privilege should not be waived in this case.

Affidavit of Jeffrey W. Reichert, Esq.  
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I hereby swear or affirm that the information is true, accurate and complete to the best of my knowledge, and that no relevant information has been omitted.

By: \_\_\_\_\_  
Jeffrey W. Reichert

Date: 11/7/22